

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION

UNITED STATES OF AMERICA

v.

GRANT LEONARD GLOVER (02)

NO. 2:21-CR-045-Z (02)

FACTUAL RESUME

In support of Grant Leonard Glover's, plea of guilty to the offense in Count Five of the indictment, Glover, the defendant, Jesse Quackenbush, the defendant's attorney, and the United States of America (the government) stipulate and agree to the following:

ELEMENTS OF THE OFFENSE

To prove the offense alleged in Count Five of the indictment, charging a violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C), that is, Distribution and Possession with Intent to Distribute Psilocin, the government must prove each of the following elements beyond a reasonable doubt:¹

- First.* That the defendant knowingly possessed a controlled substance;
- Second.* That the substance was in fact mushrooms containing psilocybin (psilocin); and
- Third.* That the defendant possessed the substance with the intent to distribute it.

¹ Fifth Circuit Pattern Jury Instruction 2.95A (5th Cir. 2019).

STIPULATED FACTS

1. On or about May 20, 2021, in the Amarillo Division of the Northern District of Texas, and elsewhere, Grant Leonard Glover, defendant, did knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of mushrooms containing psilocybin (psilocin), a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

2. In February 2018, the Amarillo Police Department (APD) began receiving tips that Demarcus Dave Grabert and Tremayne Devante Watson were selling controlled substances in Amarillo, Texas. In April 2020, a cooperating defendant told APD officers that Grabert had a source of supply for controlled substances in California. APD officers were able to identify that source of supply as Grant Leonard Glover. Officers were able to view Glover's Snapchat account, where Glover advertised the sale of marihuana and other controlled substances. In one post, Glover boasted that he shipped his products to all of the United States.

3. On May 20, 2021, Amarillo Police Department officers observed Grabert and Glover's Snapchat accounts. Glover used a filter indicating that he was in the Amarillo, Texas area. On that day, both Grabert and Glover showed illicit products and marijuana in videos posted to their Snapchat accounts. Surveillance was set up at Grabert's residence, located at 3605 S. Mirror Street, Amarillo, Texas. Officers observed a large amount of cars coming and going from the residence, indicating that the sale of controlled substances was taking place at the residence. On one video, Glover showed

the sale of a large amount of marihuana and psilocin products to a customer, who was shown counting out a large amount of U.S. currency.

4. A federal search warrant was sought and obtained for Grabert's residence. Just prior to the execution of the search warrant several people started to leave the Mirror Street residence. APD officers stopped and detained the individuals for questioning. Grabert and Glover were both caught leaving the residence.

5. During a search of Grabert's residence, officers discovered a large amount bulk marihuana, THC, mushrooms containing psilocybin, and psilocin products, and \$63,000 in U.S. currency.

6. Glover admits that he knowingly possessed with intent to distribute a controlled substance, namely mushrooms containing psilocybin (psilocin), a Schedule I controlled substance.


7. The suspected mushrooms containing psilocybin (psilocin) were sent to Forensic Laboratory Services by Postal Inspector Moseley. The Laboratory confirmed that the substance was, in fact, mushrooms containing psilocybin (psilocin), a Schedule I controlled substance. The dried mushrooms had a total net weight of 75 grams.

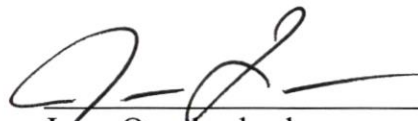
8. The defendant agrees that the defendant committed all the essential elements of the offense. This factual resume is not intended to be a complete accounting of all the facts and events related to the offense charged in this case. The limited purpose of this statement of facts is to demonstrate that a factual basis exists to support the defendant's guilty plea to Count Five of the indictment.


AGREED TO AND STIPULATED on this 12th day of October, 2021.

Chad E. Meacham
~~PRERAK SHAH~~

ACTING UNITED STATES ATTORNEY


Grant Leonard Glover
Defendant


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